



Southern  
Environmental  
Law Center

201 West Main Street, Suite 14  
Charlottesville, VA 22902-5065  
434-977-4090  
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SouthernEnvironment.org

February 3, 2009

*VIA ELECTRONIC FILING AND U.S. MAIL*

Mr. Charles L.A. Terreni  
Chief Clerk of the Commission  
S.C. Public Service Commission  
P.O. Drawer 11649  
Columbia, SC 29211

RE: Application of Carolina Power and Light Company d/b/a Progress Energy  
Carolinas, Incorporated for the Establishment of Procedures for DSM/EE  
Programs (Docket No. 2008-251-E)

Dear Mr. Terreni:

Please find enclosed for filing in the above-referenced docket the original and two copies of a Motion for Admission *Pro Hac Vice* and Verified Application of Sarah Catherine Rispin. Kindly date-stamp the extra copy and return it to me in the stamped, self-addressed envelope enclosed for your convenience. By copy of this letter I am serving a copy of the enclosed documents on all parties of record via electronic mail. If you have questions, please do not hesitate to contact me.

Sincerely,



Sarah Rispin

Enclosures

Cc (w/encl.): Parties of Record (via electronic mail)

## STATE OF SOUTH CAROLINA

(Caption of Case)  
In the Matter of:

Application of Carolina Power and Light Company  
d/b/a Progress Energy Carolinas Incorporated for the  
Establishment of Procedures for DSM/EE Programs

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

## COVER SHEET

DOCKET

NUMBER: 2008 - 251 - E

(Please type or print)

Submitted by: Chris DeSchererSC Bar Number: 77753

Address: Southern Environmental Law Center  
38 Broad Street, Suite 200  
Charleston, SC 29401

Telephone: 843-720-5270Fax: 843-720-5240

Other: \_\_\_\_\_

Email: cdescherer@sele.org

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

## DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously

☐ Other: \_\_\_\_\_

## INDUSTRY (Check one)

## NATURE OF ACTION (Check all that apply)

- |  |  |  |  |
|--|--|--|--|
| <input checked="" type="checkbox"/> Electric         | <input type="checkbox"/> Affidavit                 | <input type="checkbox"/> Letter                            | <input type="checkbox"/> Request                   |
| <input type="checkbox"/> Electric/Gas                | <input type="checkbox"/> Agreement                 | <input type="checkbox"/> Memorandum                        | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer                    | <input checked="" type="checkbox"/> Motion                 | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water              | <input type="checkbox"/> Appellate Review          | <input type="checkbox"/> Objection                         | <input type="checkbox"/> Resale Agreement          |
| <input type="checkbox"/> Electric/Water/Telecom.     | <input type="checkbox"/> Application               | <input type="checkbox"/> Petition                          | <input type="checkbox"/> Resale Amendment          |
| <input type="checkbox"/> Electric/Water/Sewer        | <input type="checkbox"/> Brief                     | <input type="checkbox"/> Petition for Reconsideration      | <input type="checkbox"/> Reservation Letter        |
| <input type="checkbox"/> Gas                         | <input type="checkbox"/> Certificate               | <input type="checkbox"/> Petition for Rulemaking           | <input type="checkbox"/> Response                  |
| <input type="checkbox"/> Railroad                    | <input type="checkbox"/> Comments                  | <input type="checkbox"/> Petition for Rule to Show Cause   | <input type="checkbox"/> Response to Discovery     |
| <input type="checkbox"/> Sewer                       | <input type="checkbox"/> Complaint                 | <input type="checkbox"/> Petition to Intervene             | <input type="checkbox"/> Return to Petition        |
| <input type="checkbox"/> Telecommunications          | <input type="checkbox"/> Consent Order             | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation               |
| <input type="checkbox"/> Transportation              | <input type="checkbox"/> Discovery                 | <input type="checkbox"/> Prefiled Testimony                | <input type="checkbox"/> Subpoena                  |
| <input type="checkbox"/> Water                       | <input type="checkbox"/> Exhibit                   | <input type="checkbox"/> Promotion                         | <input type="checkbox"/> Tariff                    |
| <input type="checkbox"/> Water/Sewer                 | <input type="checkbox"/> Expedited Consideration   | <input type="checkbox"/> Proposed Order                    | <input type="checkbox"/> Other:                    |
| <input type="checkbox"/> Administrative Matter       | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest                           |  |
| <input type="checkbox"/> Other:                      | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit             |  |
|  | <input type="checkbox"/> Late-Filed Exhibit        | <input type="checkbox"/> Report                            |  |

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2008-251-E

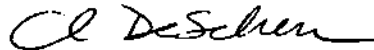
In the Matter of:	)	
Application of Carolina Power and Light	)	
Company d/b/a Progress Energy Carolinas,	)	
Incorporated for the Establishment of	)	MOTION FOR ADMISSION
Procedures for DSM/EE Programs (Docket	)	<i>PRO HAC VICE</i>
No. 2008-251-E)	)	

Natural Resources Defense Council ("NRDC"), the South Carolina Coastal Conservation League ("CCL"), the Southern Environmental Law Center ("SELC"), and Southern Alliance for Clean Energy ("SACE") hereby move the South Carolina Public Service Commission ("Commission") to permit Sarah Catherine Rispin to practice *Pro Hac Vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Rispin, with the consent of counsel of record, is simultaneously filing with the South Carolina Supreme Court a copy of the Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, ED, CCL, SELC and SACE respectfully request that this motion be granted.

This 3<sup>rd</sup> day of February, 2008.



Christopher K. DeScherer  
SC Bar No. 77753  
Southern Environmental Law Center  
38 Broad Street, Suite 200  
P.O. Box 609  
Charleston, SC 29402  
Telephone : (843) 720-5270  
Fax: (843) 720-5240

**THIS DOCUMENT IS AN EXACT DUPLICATE, WITH THE EXCEPTION OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED.**

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*  
IN THE STATE OF SOUTH CAROLINA**

Application of Carolina Power and Light  
Company d/b/a Progress Energy Carolinas,  
Incorporated for the Establishment of  
Procedures for DSM/EE Programs

Docket No. 2008-251-E

Public Service Commission of  
South Carolina

Plaintiff

Case No.

Court

vs.

Mailing Address of Court: P.O. Drawer 11649  
Columbia, SC 29211

Defendant

Comes now Sarah Catherine Rispin, applicant herein, and respectfully represents the following:

1. Applicant resides at:

106 Roy's Place

Street Address

Charlottesville

City

434) 296-2865

Telephone

City of Charlottesville

County

Virginia

State

22902

Zip Code

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern  
Environmental Law Center, with offices at, at

201 West Main Street

Street Address

Charlottesville

City

434-977-4090

Telephone

City of Charlottesville

County

Virginia

State

434-977-1483

Fax Number

22902

Zip Code

3. Applicant has been retained personally or as a member of the above named law firm by Natural  
Resources Defense Council, South Carolina Coastal Conservation League, Southern Alliance for Clean Energy and  
Southern Environmental Law Center to provide legal representation in connection with the above case now pending  
before the above named court of the State of South Carolina.

4. Since July of 2006, applicant has been, and presently is, a member in good standing of the bar of the  
highest court of the District of Columbia or the State of New York where applicant regularly practices law. Attached is a  
certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts  
applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the  
Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

n/a	n/a

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:  
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

not applicable

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

not applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

not applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

not applicable

9. Local counsel of record associated with applicant in this case is Christopher K. DeScherer, of the Southern Environmental Law Center law firm, which has offices at:

38 Broad Street, Suite 200

Street Address

Charleston

Charleston

South Carolina

29401-3042

County

City

State

Zip Code

843-720-5270

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

not applicable

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

not applicable

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 3rd day of February, 2009.

SARAH C. RISPIN

APPLICANT

**VERIFICATION**

STATE OF VIRGINIA)

COUNTY OF City of CHARLOTTESVILLE)

I, Sarah Catherine Rispin, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

S. Rispin  
APPLICANT/AFFIANT

Subscribed and sworn to before me this 3rd day of February, 2009.

Mary) Alvina LaSalle

Notary Public for the State of Virginia, City/County of Charlottesville

My Commission Expires: July 21<sup>st</sup> 2012, Registration Number 2210030



**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 3rd day of February, 2009.

Cl DeSchen  
LOCAL COUNSEL OF RECORD

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 3rd day of February, 2009.

S. Rispin  
APPLICANT/AFFIANT

# CERTIFICATE OF SERVICE

I hereby certify that the following persons have been served with the Motion for Admission Pro Hac Vice and Verified Application of Sarah Catherine Rispin by electronic mail:

Thomas S. Mullikin , Counsel  
Nucor Steel - South Carolina  
Moore & Van Allen, PLLC  
100 North Tryon Street, Ste. 4700  
Charlotte, NC, 28202  
Email: tommullikin@mvalaw.com

Robert R. Smith, II , Counsel  
Nucor Steel-South Carolina  
Moore & Van Allen, PLLC  
100 North Tyron St., Suite 4700  
Charlotte, NC, 28202  
Email: robsmith@mvalaw.com

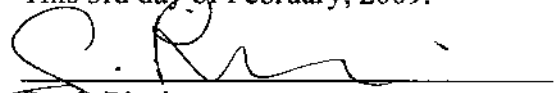
Shealy Boland Reibold , Counsel  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC, 29201  
Email: sreibol@regstaff.sc.gov

Len S. Anthony , Dep. General Counsel  
Progress Energy Carolinas, Incorporated  
Post Office Box 1551  
Raleigh, NC, 27602  
Email: Len.S.Anthony@pgnmail.com

Holly Rachel Smith , Counsel  
Wal-Mart Stores East, LP  
Russell W. Ray, PLLC  
6212-A Old Franconia Road  
Alexandria, VA, 22310  
Email: holly@raysmithlaw.com

Timothy J. Monahan , Counsel  
Wal-Mart Stores East, LP  
Monahan & Moses, LLC  
13-B W. Washington Street  
Greenville, SC, 29601

This 3rd day of February, 2009.

  
Sarah Rispin



*State of New York*  
*Supreme Court, Appellate Division*  
*Third Judicial Department*

*I, Michael J. Novack, Clerk of the Appellate Division of the  
Supreme Court of the State of New York, Third Judicial Department, do  
hereby certify that*

*Sarah Catherine Rispin*

*having taken and subscribed the Constitutional Oath of Office as prescribed by  
law, was duly licensed and admitted to practice by this Court as an Attorney  
and Counselor at Law in all courts of the State of New York on the 19th day  
of July, 2006, is currently in good standing and is registered with the  
Administrative Office of the Courts as required by section four hundred sixty-  
eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand  
and affixed the Seal of said Court, at the  
City of Albany, this 8th day of May,  
2008.*



*Michael J. Novack*  
\_\_\_\_\_  
*Clerk*